IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

:

IN RE : CHAPTER 13

CHERLY A. VAUGHN-CURRY : CASE NO: 16-17726ELF

:

Debtor

CERTIFICATION OF NO RESPONSE TO DEBTOR'S MOTION TO MODIFY PLAN

The Debtor, through counsel, hereby avers:

- 1. On January 15, 2020, Debtor filed the above-captioned motion (the "Motion"). Doc. No. 104.
- 2. On January 15, 2020, the Motion and Notice of Motion was served upon all on all secured and priority creditors and creditors who have requested notice pursuant to Fed. R. Bank. P. 2002.
- 3. Pursuant to Local Bankruptcy Rules 3015-5 and 9014-3, any response to the Motion was due no later than February 10, 2020.
 - 4. As of this date, no response has been filed to the Motion.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid

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